

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

Case No. 18-cr-123

VELASCO BARRER, Pablo Miguel, et al.

Defendant.

OPPOSITION TO DEFENDANT HERRERA’S MOTION TO PROCEED PRO SE

COMES NOW the Defendant, Pablo Miguel Velasco Barrera (“Velasco Barrera”), by counsel, and files this as his Opposition to the Motion to Proceed Pro Se filed in this matter by Defendant Ronald Herrera, and in support hereof states as follows:

1. Defendant Ronald Herrera (“Herrera”) has filed a motion to proceed pro se.
2. Defendant Pablo M. Velasco-Barrera opposes this motion because:
 - a. Herrera is not competent to serve as his own counsel in a very complex case like the one before this Court, given the apparent personal issues brought to the attention of this Court by Herrera;
 - b. If granted, Herrera’s self-representation will slow down and complicate the trial, likely present control problems for this Court, possibly confuse the jury by, inter alia, interposing erroneous objections and other trial actions that will interfere with the proper course of the trial;
 - c. If granted, Herrera’s self-representation will operate to the prejudice of Barrera and the other Defendants in this matter.

WHEREFORE the Defendant, Pablo Miguel Velasco Barrera, by counsel, files this as his opposition to Defendant Herrera's motion to proceed pro se.

Respectfully submitted,
Pablo Miguel Velasco Barrera
By Counsel

_____/s/_____
PAUL P. VANGELLOW, ESQ.
VSB#23488
Paul P. Vangellow, P.C.
Attorney for Pablo Miguel Velasco Barrera
6109A Arlington Blvd.
Falls Church, VA 22044
(703) 241-0506
fx: (703) 241-0886
pvangellow@gmail.com

_____/s/_____
Harry A. Dennis, ESQ.
Virginia State Bar No.
Attorney for the Pablo Miguel Velasco Barrera
Dennis, Stewart, & Krischer, PLLC
2045 N 15th St. Ste. 200
Arlington, VA 22201
Phone: 703-248-0626
Fax: 703-524-5283
Email: hdennis@dskvalaw.com

CERTIFICATE OF SERVICE

This is to certify that on the 22nd day of November, 2019, I filed the foregoing with the Clerk of the Court using the CM/ECF system which will send a Notice of Electronic Filing to all counsel of record.

Date: July 21, 2021

_____/s/_____
Paul P. Vangellow, Esq.
VSB#23488
Paul P. Vangellow, PC
Attorney Pablo Miguel Velasco Barrera
6109A Arlington Blvd.
Falls Church, VA 22044
(703) 241-0506
fx: (703) 241-0886
pvangellow@gmail.com

_____/s/_____
Harry A. Dennis, Esq.
Virginia State Bar No.
Attorney for the Pablo Miguel Velasco Barrera
Dennis, Stewart, & Krischer, PLLC
2045 N 15th St. Ste. 200
Arlington, VA 22201
Phone: 703-248-0626
Fax: 703-524-5283
Email: hdennis@dskvalaw.com